

**No. PD-0174-17**

**IN THE COURT OF CRIMINAL APPEALS**  
FILED  
COURT OF CRIMINAL APPEALS  
8/7/2017  
DEANA WILLIAMSON, CLERK

**THE STATE OF TEXAS**

**APPELLEE**

**V.**

**RICARDO ZUNIGA**

**APPELLANT**

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**APPELLANT'S FIRST MOTION FOR EXTENSION OF TIME TO FILE  
REPLY BRIEF**

TO THE HONORABLE COURT OF APPEALS,

Appellant moves this Court to grant an extension of time to file Appellant's Reply Brief. In support of this motion, Appellant would show the following:

- a. The deadline for filing Appellant's Brief is August 6, 2017.
- b. Appellant requests an extension of 45 day until September 20, 2017.
- c. This is Appellant's first request for an extension to file Brief.
- d. Counsel requests an extension for the following reasons:
  1. Counsel submitted Appellant's Brief to the Eighth Court of Appeals in the case styled *State v. Cedillos*, cause number 08-14-00180-CR on August 1, 2017.
  2. Counsel submitted Appellant's Reply Brief to the Court of Criminal Appeals on July 19, 2017 in the case styled *Gonzalez v. State*, cause number PD-0181-17.
  3. Counsel is working on Appellant's Brief to the Eighth Court of Appeals in

the case styled *State v. Carranza*, cause number 08-17-00298-CR which is currently due on August 10, 2017.

4. Counsel prepared for a motion to modify conditions of bond hearing held on August 2, 2017 in the case styled *USA v. Garcia*, cause number 17-CR-00298-DCG, out of the Western District of Texas.

5. Counsel is preparing an Appellant's Brief to the Eighth Court of Appeals in the case styled *State v. Al-Hanna*, cause number 08-17-00037-CR which is due on August 10, 2017.

6. Counsel is preparing for a specially set jury trial on August 14, 2017, in the case styled *State v. Lopez*, cause number 20140D06162, out of the 34<sup>th</sup> District Court in El Paso County, Texas. Counsel anticipates this will be a week-long trial that will last from at least August 14 until August 18. Defendant is charged with engaging in organized criminal activity and is facing a possible sentence of 25 years to life in prison.

7. Counsel is prepared for and continues to prepare for a specially set jury trial on August 28, 2017, in the case styled *State v. Mendoza*, cause number 20130D03082, out of the 205<sup>th</sup> District Court in El Paso County, Texas. This case was set for August 7, 2017 but was continued for 3 weeks because of a missing witness and counsel's specially set trial described above. Counsel also anticipates this trial take at least a week as there are many witnesses and defendant is also

potentially facing 25 years to life in prison. Defendant is charged with aggravated assault.

8. Counsel is preparing Appellant's Brief in the case styled *State v. Jurado*, cause number 08-17-00010, which is currently due on August 9, 2017.

#### PRAYER

Appellant prays the Court grant this motion and extend the deadline for filing Appellant's Reply Brief to September 20, 2017.

Respectfully submitted,

/s/ Ruben P. Morales  
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#### **Certificate of Service**

I certify that a copy of Appellant's Motion for Extension of Time to File Appellant's Reply Brief was sent by email, through an electronic-filing-service provider,

/s/ Ruben P. Morales  
Ruben P. Morales